

EXHIBIT H

PUBLIC - REDACTED VERSION

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

19 GOOGLE LLC,

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Plaintiff

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v.

22

SONOS, INC.,

23

Defendant.

24 Case No. 3:20-cv-06754-WHA

25

GOOGLE LLC’S FOURTH SUPPLEMENTAL OBJECTIONS AND RESPONSES TO
PLAINTIFF SONOS, INC.’S FIRST SET OF FACT DISCOVERY INTERROGATORIES
(NOS. 5, 9, 17)

26

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Google LLC (“Google”) hereby objects and responds to Plaintiff Sonos, Inc.’s (“Sonos”) First Set of Fact Discovery Interrogatories to Defendant (“Interrogatories”). Google responds to these Interrogatories based on its current understanding and the information reasonably available to Google at the present time. Google reserves the right to supplement these responses if and when additional information becomes available.

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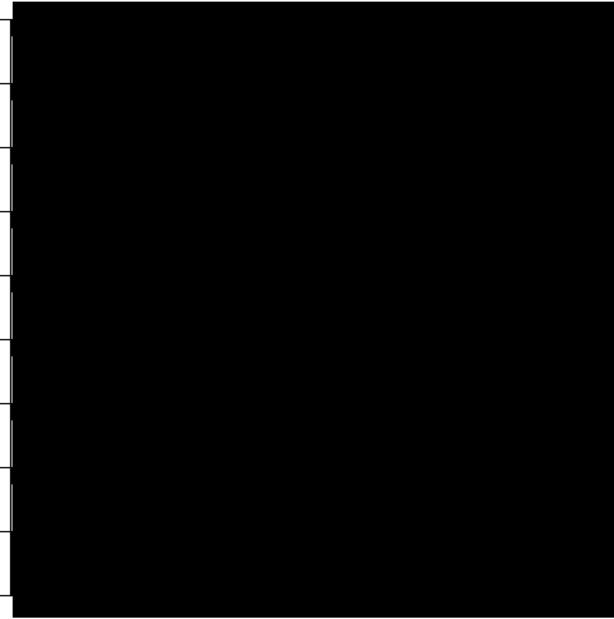
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1 Google provides the following internal code names for the accused hardware products:

2	Product Name	Internal Code Name(s)
3	Chromecast	
4	Chromecast (V3)	
5	Chromecast Ultra	
6	Chromecast Ultra	
7		
8	Chromecast Audio	
9	Chromecast Audio	
10	Chromecast with Google TV	
11	Google Home Mini	
12	Google Home Mini	
13	Nest Mini	
14	Google Home	
15	Google Home	
16	Google Home Max	
17	Nest Audio	
18	Nest Hub	
19	Nest Hub Max	
20	Nest Wifi	
21	Pixel	
22	Pixel XL	
23	Pixel 2	
24	Pixel2XL	
25	Pixel 3	
26	Pixel 3 XL	
27	Pixel 3a	
28		

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1	Pixel 3a XL
2	Pixel 4
3	Pixel 4 XL
4	Pixel 4A
5	Pixel 4A 5G
6	Pixel 5
7	Pixel Slate (tablet)
8	Pixelbook (laptop)
9	Pixelbook Go (laptop)
10	

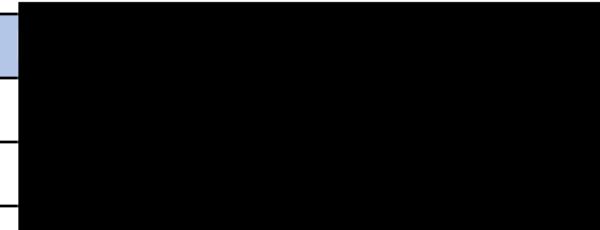


11 Google is continuing to investigate with respect to codenames, internal names, and/or project
 12 names associated with the Accused Instrumentalities. Google objects to the remainder of this
 13 request on the grounds that it is overly broad, unduly burdensome, and not proportional to the needs
 14 of the case. Google is willing to meet and confer to clarify and narrow the scope of the remainder
 15 of this request.

16 **SUPPLEMENTAL RESPONSE:** Google maintains the General and Specific objections set forth
 17 above. Subject to and without waiving the foregoing General and Specific objections, Google
 18 responds, as follows:

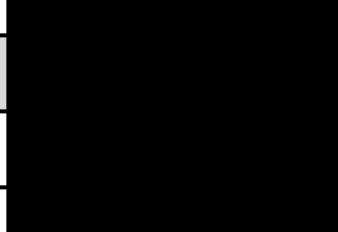
19 Google provides the additional internal code names for the accused hardware products:

Product Name
Pixel 6
Pixel 6 Pro



24 The version for the system software that was originally installed on the accused speaker
 25 products is identified below:

Product
Home Mini



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1 **THIRD SUPPLEMENTAL RESPONSE:** Google maintains the General and Specific objections
 2 set forth above. Subject to and without waiving the foregoing General and Specific objections,
 3 Google responds, as follows:

4 For the accused hardware products, the following firmware version numbers were released
 5 on the following dates¹:

6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28
Version	Device(s)	Date																				
1.32a																						
1.32b																						
1.32a																						
1.32a																						
1.33																						
1.33																						
1.34																						
1.34																						
1.35																						
1.35																						
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1.35																						
1.35																						
1.35																						
1.35																						
1.36																						
1.36																						
1.36																						
1.36																						
1.36a																						
1.32a																						
1.36b																						
1.36a																						
1.37																						
1.37																						
1.37																						
1.32a																						
1.37hf																						
1.37hf2																						

27 ¹ The dates are approximate dates, given that not all versions are rolled out in a schedule that
 28 contains the same milestones.

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1 1.39
2
3 1.39
3 1.39hf
4
4 1.39hf2
5 1.40
5 1.40
6
6 1.36b
7 1.36b
7 1.42
8
8 1.42a
9 1.42a
9 1.42a
10 1.42aHF
11 1.42HF
11 1.42HF
12
12 1.42aHF2
13 1.42st
13 1.42stHF
13 1.44
14
14 1.44
15 1.44aHF
16
16 1.44aHF2
17 1.44aHF3
17 1.46
18 1.46aHF
18 1.46
19 1.46d
19 1.46v
19 1.49
20 1.49HF
21 1.49HF
21 1.49
22 1.49HF
22 1.49 HF
23 1.50
23 1.50
24 1.50
24 1.50
25 1.50
25 1.50 HF
26 1.50 HF
26 1.52
27 1.52
27 1.52 HF
28 1.52 HF

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1	1.54
2	1.54
3	1.54
4	1.54 HF
5	1.54 HF
6	1.54bs
7	1.54bs
8	1.56
9	1.56
10	1.56
11	1.56.1
12	1.56.1
13	1.56.1 HF
14	1.56.1 HF
15	1.49HF
16	1.49 HF
17	1.50
18	1.50
19	1.50
20	1.50
21	1.50
22	1.50 HF
23	1.50 HF
24	
25	
26	
27	
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Pursuant to 33(d) of the Federal Rules of Civil Procedure, Google has produced information regarding software versions associated with the accused apps at GOOG-SONOSNDCA-00071315.

INTERROGATORY NO. 9:

For each Accused Instrumentality, identify the actual and projected sales, prices, costs,